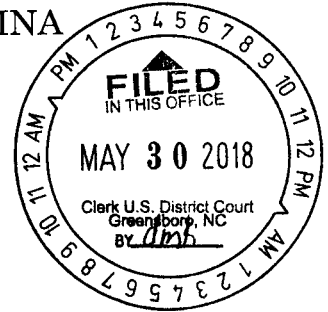


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA                     :           SUPERSEDING  
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  :           :  
  :           :  
JACOBO ROZO POSSO                           :           1:18CR120-1



The Grand Jury charges:

COUNT ONE

On or about February 5, 2017, in the County of Chatham, in the Middle District of North Carolina, JACOBO ROZO POSSO did employ, use, persuade, induce, entice, and coerce a minor, Minor-1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, and the visual depiction was transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT TWO

On or about February 5, 2017, in the County of Chatham, in the Middle District of North Carolina, JACOBO ROZO POSSO, using any facility and means of interstate commerce, did knowingly persuade, induce, entice, and coerce an individual 14 years of age, Minor-1, to engage in any sexual activity

for which any person can be charged under North Carolina state law, that is, indecent liberties with a child (N.C.G.S. § 14-202.1); in violation of Title 18, United States Code, Section 2422(b).

### COUNT THREE

In or about August 2017, in the County of Chatham, in the Middle District of North Carolina, and elsewhere, JACOBO ROZO POSSO, using any facility and means of interstate commerce, did knowingly persuade, induce, entice, and coerce an individual 14 years of age, Minor-3, to engage in any sexual activity for which any person can be charged under North Carolina state law, that is, indecent liberties with a child (N.C.G.S. § 14-202.1); in violation of Title 18, United States Code, Section 2422(b).

### COUNT FOUR

On or about October 1, 2017, in the County of Chatham, in the Middle District of North Carolina, and elsewhere, JACOBO ROZO POSSO did employ, use, persuade, induce, entice, and coerce a minor, Minor-2, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, and the visual depiction was transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; in violation of Title 18, United States Code, Section 2251(a) and (e).

### COUNT FIVE

On or about October 1, 2017, in the County of Chatham, in the Middle District of North Carolina, and elsewhere, JACOBO ROZO POSSO, using any facility and means of interstate commerce, did knowingly persuade, induce, entice, and coerce an individual 15 years of age, Minor-2, to engage in any sexual activity for which any person can be charged under North Carolina state law, that is, indecent liberties with a child (N.C.G.S. § 14-202.1); in violation of Title 18, United States Code, Section 2422(b).

### COUNT SIX

On or about October 4, 2017, in the County of Durham, in the Middle District of North Carolina, JACOBO ROZO POSSO, using any facility and means of interstate commerce, did knowingly persuade, induce, entice, and coerce an individual 14 years of age, Minor-1, to engage in any sexual activity for which any person can be charged under North Carolina state law, that is, indecent liberties with a child (N.C.G.S. § 14-202.1); in violation of Title 18, United States Code, Section 2422(b).

### COUNT SEVEN

From in or about February 2017, continuing up to and including in or about January 2018, the exact date to the Grand Jurors unknown, in the County of Chatham, in the Middle District of North Carolina, JACOBO ROZO POSSO did knowingly receive any child pornography, as defined in Title 18,

United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

#### COUNT EIGHT

On or about March 1, 2018, in the County of Chatham, in the Middle District of North Carolina, JACOBO ROZO POSSO did knowingly possess material which contained child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), and which had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been shipped and transported in and affecting interstate and foreign commerce, including by computer; in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

#### FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged above, the defendant, JACOBO ROZO POSSO, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a)(1) and (a)(3), all visual depictions described in Title 18, United States Code, Sections 2252A or

2252, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of the United States Code, and all property, real or personal, used or intended to be used to commit or promote the commission of the offense of conviction, including but not limited to the following items that were obtained from defendant on March 1, 2018:

- a. One iPhone7.

All in accordance with Title 18, United States Code, Section 2253, Rule 32.2, Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).

DATED: May 29, 2018

MATTHEW G.T. MARTIN  
United States Attorney



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BY: ERIC L. IVERSON  
Assistant United States Attorney

A TRUE BILL:

FOREPERSON